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12 **UNITED STATES DISTRICT COURT**  
13 **CENTRAL DISTRICT OF CALIFORNIA**

14 FIONA HARVEY,

15 Plaintiff,

16 v.

17 NETFLIX, INC. and NETFLIX  
18 WORLDWIDE ENTERTAINMENT,  
LLC,

19 Defendants.  
20

Case No. 2:24-cv-04744-RGK-AJR

Hon. R. Gary Klausner

**JOINT STIPULATION SETTING  
BRIEFING SCHEDULE ON  
DEFENDANTS' SPECIAL MOTION TO  
STRIKE AND MOTION TO DISMISS  
COMPLAINT AND CONTINUING  
HEARING AND RULE 16(B)  
SCHEDULING CONFERENCE**

[FIRST REQUEST FOR EXTENSION]

22 Current Opp. Deadline: Aug. 13, 2024  
23 Current Reply Deadline: Aug. 20, 2024  
24 Current Hr'g Date: Sept. 3, 2024 at 9:00 a.m.  
Current Conf.: Sept. 9, 2024 at 9:00 a.m.

25 New Opp. Deadline: Sept. 9, 2024  
26 New Reply Deadline: Sept. 23, 2024  
27 New Hr'g Date: Oct. 15, 2024 at 9:00 a.m.  
28 New Conf.: Oct. 28, 2024 at 9:00 a.m.

1 It is stipulated between and among Plaintiff Fiona Harvey (“Plaintiff”) and  
2 Defendants Netflix, Inc. and Netflix Worldwide Entertainment, LLC (collectively,  
3 “Defendants”) by their respective counsel, as follows:

4 WHEREAS, on June 6, 2024, Plaintiff filed the complaint in this matter  
5 (ECF No. 1), and served Defendants on June 28, 2024 (ECF No. 20);

6 WHEREAS, on July 15, 2024, the Parties stipulated to extend Defendants’  
7 time to respond to the Complaint from July 19, 2024 to July 29, 2024 pursuant to  
8 Local Rule 8-3 (ECF No. 21);

9 WHEREAS, Defendants filed a special motion to strike on July 29, 2024  
10 (ECF No. 26), and noticed the hearing on the special motion to strike for  
11 September 3, 2024;

12 WHEREAS, Defendants also filed a motion to dismiss on July 29, 2024  
13 (ECF No. 28), and noticed the hearing on the motion to dismiss for September 3,  
14 2024;

15 WHEREAS, the Parties have agreed to the following briefing schedule for  
16 Defendants’ special motion to strike and motion to dismiss and continued hearing  
17 and conference dates to accommodate Plaintiff’s counsel’s schedules and to  
18 provide Plaintiff’s counsel sufficient time to respond to the motions and  
19 Defendants’ counsel sufficient time to respond to the oppositions: Plaintiff’s  
20 oppositions to the special motion to strike and motion to dismiss shall be due on or  
21 before September 9, 2024; Defendants’ replies in support of their special motion to  
22 strike and motion to dismiss shall be due on or before September 23, 2024; the  
23 hearing on Defendants’ special motion to strike and motion to dismiss shall be  
24 continued to October 15, 2024 at 9:00 a.m.; and the Rule 16(b) Scheduling  
25 Conference shall be continued to October 28, 2024 at 9:00 a.m.

26 WHEREAS, this would be Plaintiff’s first extension of time in this case and  
27 Defendants’ first extension of time in this case requiring leave of Court.  
28

1 WHEREAS, this Stipulation will not affect any other deadlines that have  
2 been currently set by the Court;

3 **ACCORDINGLY, IT IS HEREBY STIPULATED AND AGREED** by  
4 and between the Parties, through their respective counsel and subject to the Court's  
5 approval, that:

- 6 1. Plaintiff's oppositions to Defendants' special motion to strike and  
7 Defendants' motion to dismiss shall be due on or before September 9,  
8 2024;
- 9 2. Defendants' replies in support of their special motion to strike and  
10 motion to dismiss shall be due on or before September 23, 2024;
- 11 3. The hearing on Defendants' special motion to strike and motion to  
12 dismiss shall be continued to October 15, 2024 at 9:00 a.m.;
- 13 4. The Rule 16(b) Scheduling Conference shall be continued to October 28,  
14 2024 at 9:00 a.m.

15 Dated: August 1, 2024

THE ROTH LAW FIRM, PLLC

By: /s/ Brian Levenson

Brian Levenson (*pro hac vice*)

Richard A. Roth (*pro hac vice*)

THE LAW OFFICE OF ALLEN HYMAN

Allen Hyman

*Attorneys for Plaintiff*

Fiona Harvey

22 Dated: August 1, 2024

LATHAM & WATKINS LLP

Marvin S. Putnam

By: /s/ Marvin S. Putnam

Marvin S. Putnam

*Attorneys for Defendants*

Netflix, Inc. and Netflix Worldwide  
Entertainment, LLC

**ATTESTATION REGARDING SIGNATURES**

Pursuant to Local Rule 5-4.3.4(a)(2)(i), I hereby attest that all other signatories listed, and on whose behalf this filing is submitted, concur in this filing's content and have authorized this filing.

Dated: August 1, 2024

By /s/ Brian Levenson  
Brian Levenson